



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 22, 2023

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED *Vern Bro*

VERNON S. BRODERICK

U.S.D.J. 11/22/2023

Re: *United States v. Ramirez-Rodriguez, 23 Cr. 363 (VSB)*

Dear Judge Broderick:

The Government writes with respect to defendant Lepido Ramirez-Rodriguez's motion to dismiss the Indictment. *See* Dkt. Nos. 14-15. The Government's response is currently due on November 27, 2023.

The Government respectfully requests that its deadline to respond to the defendant's motion be extended by four days, to December 1, 2023. The Government is requesting this brief extension to further consider and internally consult regarding the arguments that the defendant raises, some of which are currently before the Second Circuit. *See United States v. Raul Gutierrez-Campos*, No. 22-438 (2d Cir.). The parties have discussed this proposed modification to the briefing schedule, and defense counsel consents to the request. The requested modification does not affect the dates for the defendant's reply, due December 8, 2023, or the status conference scheduled for December 20, 2023.

Respectfully submitted,

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